

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

FILED

2011 MAY 25 P 3:13

UNITED STATES OF AMERICA,

Plaintiff,

VS.

RANDALL GLEN GOODALE,

Defendant.

CLERK, US DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

CRIMINAL NO. SA 11-CR-TERN  
SA 11-CR-0409-XR  
INDICTMENT

Counts 1-2:18 U.S.C. § 1344 Bank Fraud

)

Count 3:18 U.S.C. § 1028A(a)(1) Aggravated  
Identity Theft

)

THE GRAND JURY CHARGES:

**A BANK FRAUD SCHEME**  
[18 U.S.C. § 1344]

**A. INTRODUCTION**

At all times material to this indictment, within the Western District of Texas, Wells Fargo Bank was a financial institution insured by the Federal Deposit Insurance Corporation.

**B. THE SCHEME TO DEFRAUD**

1. That on or about July 17, 2009, in the Western District of Texas, the defendant,

**RANDALL GLEN GOODALE,**

knowingly executed and attempted to execute a scheme and artifice to defraud and to obtain the moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of Wells Fargo Bank, insured by the Federal Deposit Insurance Corporation, by means of false and fraudulent pretenses, representations, and promises.

**C. MANNER AND MEANS OF THE SCHEME TO DEFRAUD**

It was a part of the scheme and artifice to defraud financial institutions and to obtain money under said financial institutions' custody and control by means of false and fraudulent pretenses, representations, and promises in order to deceive, that:

- 1) Defendant **Randall Glen Goodale** would and did possess stolen checks which were drawn on another individual's Wells Fargo Bank checking account.
- 2) Defendant **Randall Glen Goodale** would and did possess a driver's license which had been stolen from that same individual.
- 3) Defendant **Randall Glen Goodale** would and did fraudulently negotiate the stolen checks at a business in La Vernia, Texas, within the Western District of Texas.
- 4) Defendant **Randall Glen Goodale** would and did receive cash proceeds and other things of value from the negotiation of such stolen checks.

**D. THE EXECUTION OF THE SCHEME**

**COUNT ONE**  
[18 U.S.C. § 1344]

1. The United States Grand Jury hereby incorporates by reference and realleges all of the allegations of Sections A, B, and C of this Indictment.
2. On or about July 17, 2009, in the Western District of Texas, the defendant,

**RANDALL GLEN GOODALE,**

for the purpose of executing the aforementioned scheme and artifice to defraud Wells Fargo Bank, and to obtain moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of Wells Fargo Bank, a financial institution insured by the Federal Deposit

Insurance Corporation, by means of false and fraudulent pretenses, representations, and promises, did knowingly and fraudulently negotiate stolen check #1242 in the amount of \$71.96, drawn on another individual's Wells Fargo Bank account at La Vernia One Stop, in La Vernia, Texas, in violation of Title 18, United States Code, Section 1344.

**COUNT TWO**  
[18 U.S.C. § 1344]

1. The United States Grand Jury hereby incorporates by reference and realleges all of the allegations of Sections A, B, and C of this Indictment.
2. On or about July 17, 2009, in the Western District of Texas, the defendant,

**RANDALL GLEN GOODALE,**

for the purpose of executing the aforementioned scheme and artifice to defraud Wells Fargo Bank, and to obtain moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of Wells Fargo Bank, a financial institution insured by the Federal Deposit Insurance Corporation, by means of false and fraudulent pretenses, representations, and promises, did knowingly and fraudulently negotiate stolen check #1244 in the amount of \$107.14, drawn on another individual's Wells Fargo Bank account at La Vernia One Stop, in La Vernia, Texas, in violation of Title 18, United States Code, Section 1344.

**COUNT THREE**  
[18 U.S.C. § 1028A(a)(1)]

- On or about July 17, 2009, in the Western District of Texas, the defendant,

**RANDALL GLEN GOODALE,**

did knowingly possess and use, without lawful authority, a means of identification of another person, to wit: the person's drivers' licence number, during and in relation to an offense under 18

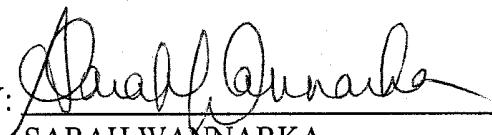
U.S.C. § 1344, namely, Bank Fraud, a felony offense enumerated under 18 U.S.C. § 1028A(c)(5).

All in violation of Title 18 United States Code, Section 1028A(a)(1).

A TRUE BILL

FORE [REDACTED] THE GRAND JURY

JOHN E. MURPHY  
UNITED STATES ATTORNEY

BY: 

SARAH WANNARKA  
Assistant United States Attorney